

ADEQ FY 2013 FINAL AIR PROGRAM WORKPLAN EOY Comments

National Goal 1:

Taking Action on Climate Change and Improving Air Quality. Reduce greenhouse gas emissions and develop adaptation strategies to address climate change, and protect and improve air quality.

National Objective 1.2:

Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
1	<p>Develop and submit 2010 NO₂ and SO₂ NAAQS infrastructure SIPs, subject to availability of implementation rules (or guidance as appropriate).</p> <p>ADEQ: Working to adopt these NAAQS into state regulations. Infrastructure SIP submittals to follow.</p> <p>EPA: We encourage ADEQ to submit these SIPs. Because of lawsuits, EPA may need to make findings of failure to submit the SIPs.</p>	Periodic Planning Calls / Governor's Letter	1/23/13 for NO ₂ 6/3/13 for SO ₂
2	<p>Begin drafting Ozone Nonattainment SIP</p> <p>ADEQ: Nonattainment SIP for ozone not needed due to marginal classification.</p> <p>EPA: The marginal area base year Emission Inventory SIP is due 7/20/2014. EPA recognizes that ADEQ may not be able to meet this date.</p>	Periodic Planning Calls / EOY Review	9/30/2013
3	<p>Continue to work with EPA on issues related to development of a revised regional haze SIP</p> <p>ADEQ: Discussions with R6 ongoing.</p> <p>EPA: We appreciate ADEQ's effort to revise the regional haze SIP.</p>	Periodic Planning Calls	Ongoing

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4	<p>Develop and submit a SIP revision addressing Regional Haze 5-year progress report requirements.</p> <p>ADEQ: Draft SIP under in-house review; to be submitted to FLM's for review.</p> <p>EPA: We look forward to the receipt of this SIP revision.</p>	Periodic Planning Calls/SIP Submittal	Ongoing. Will be due during FY 2013 (Q3).
5	<p>Work with Region 6, as necessary, to implement local, voluntary ozone reductions programs (i.e. Ozone Advance) to help achieve or maintain attainment of 2008 8-hour ozone NAAQS.</p> <p>ADEQ: While Arkansas does not currently participate in any voluntary programs at present, we remain open to future participation as appropriate</p> <p>EPA: We encourage ADEQ to visit the Advance website (www.epa.gov/ozoneadvance) and use the various resources to address particulate matter and ground-level ozone, as needed.</p>	Periodic Planning Calls	Ongoing
6	<p>Work with Region as necessary to address 110(a)(2)requirements for PM2.5.</p> <p>ADEQ: Working to adopt this NAAQS into state regulations. SIP submittal to follow.</p> <p>EPA: We encourage the Arkansas Department of Environmental Quality to address this outstanding issue.</p>	Periodic Planning calls and end-of-year review	9/30/2013

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7	<p>Work with EPA to address any issues raised related to submitted "Threshold Revision" SIP</p> <p>ADEQ: Awaiting questions from EPA.</p> <p>EPA: We are currently reviewing this SIP submittal and will contact ADEQ with any questions. We appreciate ADEQ's assistance with this review.</p>	Periodic Planning Calls	Ongoing
8	<p>Submit draft, proposed, and/or final SIPs, equivalency demonstrations, and/or delegation requests, as necessary, in response to revisions to NSR rules.</p> <p>ADEQ: Working to adopt 2006 PM 2.5 NAAQS federal PSD provisions into state regulations. SIP submittal to follow.</p> <p>EPA: We encourage ADEQ to submit this SIP as expeditiously as possible.</p>	Submission to EPA	Ongoing / Within timeframes specified in CAA / federal rules
9	<p>Work with Region 6, as appropriate and resources allow, to administer and implement the Diesel Emission Reduction grant program.</p> <p>ADEQ: Arkansas actively participates in the Diesel Emissions Reduction grant program by selecting projects for funding and ensuring program requirement are met.</p> <p>EPA: Thank you for your continued commitment to the Diesel Emissions Reduction grant program.</p>	Periodic Planning Calls / EOY Review	Ongoing

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10	<p>Submit revisions to the SIP, as necessary, within time frame allowed by federal rules.</p> <p>ADEQ: Arkansas strives to submit SIP revisions as required by the CAA and is working to submit required SIP revisions.</p> <p>EPA: We appreciate your work to meet the requirements for SIPs and we look forward to receiving them. We note that FIP clocks are running for infrastructure and Regional Haze SIPs, and EPA will soon start a FIP clock for the PM2.5 PSD SIP.</p>	SIP Submittal	As needed / Within timeframes specified in CAA / federal rules
11	<p>Implement applicable requirements of the approved SIP, specific to CAIR.</p> <p>ADEQ: Accomplished through permitting and enforcement. CAIR allocations made following stay of CSAPR.</p> <p>EPA: We appreciate your work to meet the requirements for the allocation submittal.</p>	Periodic Planning Calls / EOY Review	Ongoing
12	<p>Participate in the Blue Skyways Collaborative, its Task Forces, Technical Workgroups, meetings, and projects, among others, as resources allow.</p> <p>ADEQ: BSC has not sent out any meeting or conference call notices.</p> <p>EPA: We appreciate ADEQ's participation in the BSC in the past when the BSC was more active. We encourage Arkansas to participate in any diesel funding opportunities offered that may become available through the BSC.</p>	EOY Review	Ongoing

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13	<p>Review and concur on conformity determination revisions for non-attainment and maintenance areas for transportation related criteria pollutants (e.g., ozone, CO, PM2.5, PM10).</p> <p>ADEQ: Ok.</p> <p>EPA: We appreciate ADEQ's technical support of and commitment to the interagency consultation process.</p>	Conformity determination	As necessary
14	<p>Review air quality reports and take appropriate actions dealing with new areas violating attainment of any of the NAAQS.</p> <p>ADEQ: As Necessary</p> <p>EPA: We note that preliminary data for 2013 indicates that the Little Rock area is violating the 2008 ozone NAAQS.</p>	Periodic Planning Calls / EOY Review	Ongoing
15	<p>Consult with and provide assistance to transportation agencies in maintenance areas and review transportation plans to ensure compliance with the SIP.</p> <p>ADEQ: Ongoing</p> <p>EPA: Thank you for your continued commitment to the Diesel Emissions Reduction grant program</p>	Participation in interagency consultation process	As necessary

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16	<p>Participate in consultation and evaluation of project-specific emissions, in accordance with general conformity requirements</p> <p>ADEQ: Ok.</p> <p>EPA: EPA appreciates ADEQ's technical support of and commitment to the interagency consultation process.</p>	Participation in interagency consultation process	As necessary
17	<p>Continue to work with Region 6 regarding delegation of portions of Section 112 Standards.</p> <p>ADEQ: Ok.</p> <p>EPA: Thank you for addressing requirements under Clean Air Act Section 112.</p>	Periodic Calls	Ongoing

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18	<p>Report real time ozone, NO₂, SO₂ and PM_{2.5}, to AirNOW for cities required to report the AQI (states/locals).</p> <p>ADEQ: Ozone and PM2.5 ongoing; Plan to implement NO2 and SO2 into the AirNOW reporting system for the Little Rock/North Little Rock area.</p> <p>EPA: We appreciate ADEQ's support for AirNOW system for ozone and PM2.5 data and plans to address NO2 and SO2 reporting for the Little Rock MSA.</p>	AirNow	Ongoing [present target is within 20 minutes; long-term goal is 5 minutes]
19	<p>Notify 6PD-Q prior to establishing, modifying, relocating, or discontinuing any monitor and/or site.</p> <p>ADEQ: Done</p> <p>EPA: Region 6 appreciates ADEQ notifying us prior to modifications and/or relocations. The annual network plan identifies any requested changes to the network.</p>	Letter	30 days prior to change
20	<p>Conduct quarterly QA checks for flow rates of PM_{2.5}speciation/Pb monitors.</p> <p>ADEQ: Goals met.</p> <p>EPA: We appreciate ADEQ's commitment to meeting this requirement for all PM and Pb monitors. We are currently working with ADEQ to ensure Pb PEP collocation audits are conducted quarterly.</p>	AQS	Quarterly

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21	<p>Consider expanding air quality reporting and forecasting to additional cities, including particle pollution forecasting.</p> <p>ADEQ: No cities added.</p> <p>EPA: We appreciate ADEQ's support for the AirNOW system.</p>	AirNow	Ongoing
22	<p>Certify 2012 NAAQS pollutant data in AQS and provide supporting documentation.</p> <p>ADEQ: Deadline met.</p> <p>EPA: Region 6 received the initial documentation on May 1, 2013 and the complete package on March 10, 2014 using the new data certification process. We appreciate ADEQ's use of the new data certification process.</p>	Letter with appropriate AQS reports	5/1/13
23	<p>Submit 2014 annual network plan required by 40 CFR § 58.10. The plan should address new applicable NAAQS monitoring requirements.</p> <p>ADEQ: Completed.</p> <p>EPA: Region 6 received the documentation dated July 8, 2013.</p>	Network Assessment	07/01/13 (or as determined by alternate approved schedule)

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24	<p>Produce quality data and submit updated Quality Management Plan and Quality Assurance Project Plans annually.</p> <p>ADEQ: 2013 QAPP approved; 2014 QAPP completed awaiting approval.</p> <p>EPA: The QMP was approved on March 14, 2013. The 2013 Ambient Air Monitoring QAPP was approved on December 30, 2013. We have not received the 2014 QAPP; it is due 60 days before expiration, December 30, 2014. We will work with ADEQ to address QAPP requirements for the Pb PEP collocation audits in the 2014 QAPP.</p>	QMP and QAPP's	Annually; various dates (one year after approval date)
25	<p>Submit all monitoring data including criteria and QA to AQS, according to schedule in 40 CFR Part 58. The target data completeness rate is 75% of the potential concentration values based on the operating EPA-funded state/local monitors and their sampling schedule. Target for QA data is 75% of checks required by 40 CFR 58.</p> <p>ADEQ: Deadline and goals met.</p> <p>EPA: Monitoring data is being submitted in a timely fashion and target completeness criteria are being met. For FY2013, Q2 Pb data was not entered in AQS in a timely manner. The 2013 Pb semi-annual flow rate audits were not entered in AQS.</p>	AQS	<p>Quarterly, no later than 90 days after the end of the calendar quarter</p> <p>CY 12 Q3 12/31/12 CY 12 Q4 03/31/13 CY 13 Q1 06/30/13 CY 13 Q2 09/30/13</p>

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
26	<p>Notify EPA Region 6 of any situation (such as monitor malfunction or data validation issue) that results in missing continuous data of more than 120 consecutive hours or two consecutive non-continuous samples and identify the corrective action taken to minimize the loss of data.</p> <p>ADEQ: Done; All missing data events are documented in missing data log.</p> <p>EPA: On March 18, 2013 EPA received the 2012 missing data report.</p>	Letter or Email	As soon as possible, but no more than 14 days after the event
27	<p>Work with Region to resolve any backlog of flagged critical review records or exceptional events, as necessary.</p> <p>ADEQ: Done.</p> <p>EPA: Region 6 did not receive any exceptional events packages in FY2013.</p>	Conference calls / Exceptional Event Demonstration	9/30/13
28	<p>Operate monitors for NAAQS pollutants, NCORE, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs.</p> <p>ADEQ: Done.</p> <p>EPA: ADEQ operates monitors for NAAQS pollutants and NCore according to plans and grant agreements. We are currently working with ADEQ to ensure Pb PEP collocation audits are conducted quarterly. ADEQ is not required to monitor for PAMS.</p>	End-of-year review	9/30/13

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29	<p>Report data from operational NCORE multi-pollutant precursor gas monitoring sites to AQS.</p> <p>ADEQ: Done.</p> <p>EPA: Data for the precursor gases was reported to AQS. Since NCORE met the operational requirements in 2011, all pollutant data is documented in item number 25.</p>	End-of-year review	9/30/12
30	<p>Collaborate as needed with the Region as it performs Technical Systems Audits on 1/3 of Primary Quality Assurance Organizations. States/Locals should conduct Technical Systems Audits of their contract laboratories.</p> <p>ADEQ: TSA occurred on 11/26/12 through 11/29/12</p> <p>EPA: We appreciate ADEQ's work and effort during the TSA.</p>	<p>Region 6 TSA</p> <p>Contract Laboratory TSA</p>	Scheduled TSA FY12

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
31	<p>Submit PSD permits, including major modifications, electronically to EPA Region 6, and NSR minor source permits as requested by EPA.</p> <p>ADEQ: We only send PSD applications. We send all TV draft permits which would include PSD, if applicable.</p> <p>EPA: We appreciated ADEQ's timely submittal of draft and final PSD permits to EPA Region 6. EPA also appreciates ADEQ providing the specific Minor NSR permits, as requested by Region 6.</p>	As requested	Ongoing
32	<p>Respond to EPA's concerns on implementation of NSR program.</p> <p>ADEQ: No issued have been raised in this matter.</p> <p>EPA: EPA has some developing concerns about the PSD and Minor NSR permitting programs. We appreciate ADEQ's assistance as we work to resolve these concerns.</p>	Monthly conference call	Within 90 days of notice from EPA
33	<p>Issue 78 % of major NSR permits within one year of receiving a complete permit application.</p> <p>ADEQ: ADEQ target goal is 6 months.</p> <p>EPA: We appreciate ADEQ's commitment to meet this requirement for timely permit issuance.</p>	End-of-year review	09/30/13

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34	<p>Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including “the application accepted date” and “the permit issuance date” in to the RBLC national database.</p> <p>ADEQ: This is done with final permit issuance.</p> <p>EPA: We appreciate ADEQ’s continuing efforts to provide this data within the RBLC database.</p>	End-of-year review	09/30/13
35	<p>Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RBLC. Provide EPA 30 days notification for review of the Draft permits. Respond to EPA’s concerns prior to issuing the final permit.</p> <p>ADEQ: ADEQ has no issues with this item.</p> <p>EPA: We appreciate ADEQ’s continued coordination with EPA during the issuance of NSR permits and their updates made to the RBLC.</p>	http://mapsweb.rtpnc.epa.gov/RBLCWebbd/bb102.htm	BACT/LAER database entry within 30 days of final permit issuance.
36	<p>Initiate revisions to existing state regulations to ensure permits contain appropriate controls to implement EPA’s NAAQS standards including but not limited to NO2 1- Hr. standard, SO2 1-Hr. standard, and PM 2.5 standard. Also, work to ensure permits contain appropriate controls to implement the EPA NAAQS standards.</p> <p>ADEQ: Revisions initiated Sept 2012.</p> <p>EPA: We appreciate ADEQ’s work to meet CAA requirements for SIPs. We note that we have an ongoing FIP clock for the 2008 PM2.5 SIP and soon will start a FIP clock for the 2010 PM2.5 PSD SIP.</p>	EOY Review	Ongoing

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37	<p>Provide PSD and nonattainment applications, minor source permits as requested by Region, and draft permits to EPA.</p> <p>ADEQ: This seems to be a duplication of item 31. See response for that item.</p> <p>EPA: We appreciate ADEQ's assistance in providing requested permit application information and draft permits for PSD, nonattainment, and Minor NSR permit actions.</p>	Copy of applications and draft permits	As required
38	<p>Make case by case MACT determinations for all applicable sources under Section 112(g), including appropriate compliance monitoring measures, as appropriate</p> <p>ADEQ: This is done as appropriate; there were no 112(g) determinations in last FY.</p> <p>EPA: EPA acknowledges that ADEQ did not make any 112(g) determinations in FY2013. We appreciate ADEQ's commitment to meet this requirement, as appropriate.</p>	Implement 40 CFR 63 process requirements	As appropriate

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ADEQ Item #	Emission Inventory Activity	Output/Reporting Mechanism	Time Frame
39	<p>Submit the 2011 State-wide emission inventories for criteria pollutants required by EPA's air emission reporting requirements, via CDX, for large point sources.</p> <p>ADEQ: Completed</p> <p>EPA: Thank you for providing the EI data for criteria pollutants.</p>	Submittal to NEI	12/31/12
40	<p>Submit available 2011 toxics inventories for large point sources via CDX.</p> <p>ADEQ: Ongoing</p> <p>EPA: Thank you for providing the EI data for air toxics.</p>	Submittal to NEI	12/31/12
41	<p>Review and quality assure the integrated 2011 NEI for Hazardous Air Pollutants (HAP) and Criteria Air Pollutants (CAPs), as appropriate. Review and quality assure data for the National Air Toxics Assessment (NATA), as appropriate.</p> <p>ADEQ: Ongoing</p> <p>EPA: Thank you for ensuring the quality of the air toxics emission data.</p>	End-of-year review	09/30/13
42	<p>Quality assure, validate, and revise NEI facility data using EIS components.</p> <p>ADEQ: Completed</p> <p>EPA: Thank you for ensuring the quality of data in the Emissions Inventory System.</p>	End-of-year review	09/30/13

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ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
43	<p>Submit a Compliance Monitoring Strategy or an update to the strategy, including the number of Major and 80% SM sources consistent with the revised Clean Air Act Stationary Source Compliance Monitoring Strategy dated 9/10/10.</p> <p>ADEQ: Accomplished</p> <p>EPA: Agree, the FY13 CMS Plan was submitted timely.</p>	Letter	Annually
44	<p>Complete the universe of planned inspections / document findings consistent with the compliance monitoring strategy (CMS). Include:</p> <ul style="list-style-type: none"> • Identify universe of Majors and 80% SM • Complete other compliance monitoring inspections (e.g. PCEs) <p>ADEQ: FY2013 Inspections have been performed in accordance with our CMS</p> <p>EPA: Agree. ADEQ completed all the FCEs consistent with the approved FY13 CMS Plan & is meeting the CMS frequency 100%.</p>	AFS / Inspection Reports	Data input Ongoing
45	<p>Report High Priority Violations to EPA in a timely manner consistent with HPV Policy.</p> <p>ADEQ: All HPV's for 2013 have been entered and reviewed during monthly conference call</p> <p>EPA: ADEQ strives to enter all HPVs timely & notifies Region 6 when there is an issue. HPVs are properly identified, entered & discussed during the</p>	HPV conference call	Monthly

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	monthly conference call.		
46	<p>State compliance monitoring and enforcement actions are conducted in accordance with federal minimum standards, state law and regulations.</p> <p>ADEQ: FY2013 Inspections are completed.</p> <p>EPA: ADEQ conducted all inspections & enforcement actions in accordance with Federal and state laws, regulations & policies.</p>	As required	Ongoing
47	<p>Enter all required and accurate data (minimum data requirements) into AIRS consistent with the October 1, 2008 Source Compliance and State Action Reporting (SFB83 Supporting Statement)</p> <ul style="list-style-type: none"> • Review Database to ensure minimum data requirements are being entered into AFS • Review CMRs to ensure accurate minimum data requirements are being entered into AFS <p>ADEQ: Entry is complete. Have attended all monthly calls</p> <p>EPA: Agree. ADEQ is reviewing, verifying & making necessary corrections to data, due to be verified to EPA HQ by 2/14/14.</p>	AFS/HPV conference call	<p>Monthly</p> <p>Ongoing</p>
48	<p>Enter all required TV annual compliance certification information, including date due, date received, date reviewed, whether deviations were reported (Y/N), and compliance status, into AIRS.</p> <p>ADEQ: All entry is complete for FY2013. Still performing data review prior to data being frozen.</p> <p>EPA: Agree. States/Locals have until 2/14/14 to</p>	AFS	Monthly

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	verify that the FY2013 data is correct as entered.		